### IN THE UNITED STATES DISTRICT COURT

### FOR THE EASTERN DISTRICT OF PENNSYLVANIA

CRIMINAL NO.

**18 U.S.C.** § **1001** (Making a false

statement to a federal officer - 1 count)

v.	:	DATE FILED:	
JUANITA SHAUNTE STEADLEY, a/k/a JUANITA STEADLEY	:	VIOLATIONS:	
STOKES			18 U.S.C. § 924(a)(1)(A)
			(Making a false
			statement to a firearms
			dealer - 1 count)

<u>INDICTMENT</u>

## **COUNT ONE**

### THE GRAND JURY CHARGES THAT:

**UNITED STATES OF AMERICA** 

At all times relevant to this indictment:

- 1. The Firing Line Gun Shop, located in Philadelphia, Pennsylvania, possessed a federal firearms license ("FFL") and was authorized to deal in firearms under federal law.
- 2. FFL holders were licensed, among other things, to sell firearms and ammunition. Various rules and regulations promulgated under the authority of Title 18, United States Code, Chapter 44 (Sections 921-929) govern the manner in which an FFL holder may sell firearms and ammunition.
- 3. The rules and regulations governing FFL holders required that a person seeking to purchase a handgun fill out a "Firearms Transaction Record," ATF Form 4473. Part of

the Form 4473 required that the prospective purchaser certify truthfully, subject to penalties of perjury, that he or she has not made any false oral or written statements with respect to the transaction, and that he or she was the actual buyer of the firearm. The Form 4473 contained language warning that "[t]he federal firearms laws require that the individual filling out this form must be buying the firearm for himself or as a gift. Any individual who is not buying the firearm for himself/herself or as a gift, but who completes this form, violates the law."

- 4 FFL holders were required to maintain a record, in the form of a completed Form 4473, of the identity of the actual buyer of firearms sold by the FFL holder, including the buyer's address.
- 5. On or about November 29, 2002, at Philadelphia, in the Eastern District of Pennsylvania, defendant

## JUANITA SHAUNTE STEADLEY, a/k/a JUANITA STEADLEY STOKES,

in connection with the acquisition of a firearm, that is, a Sig Arms, Model 2340, .357 caliber semi-automatic pistol, serial number SP0061985, from the Firing Line, Inc., an FFL holder, knowingly made false statements and representations with respect to information required under Title 18, United States Code, Chapter 44 (Sections 921-929) to be kept in the records of the Firing Line, Inc., in that defendant JUANITA SHAUNTE STEADLEY certified under penalty of perjury on ATF Form 4473, Firearms Transaction Record, that she was the actual buyer of the firearm and that she resided at 5921 Baltimore Avenue, Philadelphia, PA, when in fact she knew these statements to be false and fictitious.

In violation of Title 18, United States Code, Section 924(a)(1)(A).

### COUNT 2

### THE GRAND JURY FURTHER CHARGES THAT:

On or about May 14, 2003, at Philadelphia, in the Eastern District of Pennsylvania, defendant

# JUANITA SHAUNTE STEADLEY, a/k/a JUANITA STEADLEY STOKES

in a matter within the jurisdiction of the Bureau of Alcohol, Tobacco, Firearms and Explosives [ATF], an agency of the executive branch of the United States, knowingly and willfully made materially false, fictitious, and fraudulent statements and representations denying that she had purchased from a licensed firearms dealer for another individual, a firearm, that is, a Sig Arms Model 2340, .357 caliber semi-automatic pistol, serial number SP0061985.

In violation of Title 18, United States Code, Section 1001.

	A TRUE BILL:	A TRUE BILL:		
	FOREPERSON			
PATRICK L. MEEHAN				
United States Attorney				